

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
AMERICAN METROCOMM)	Bankruptcy No. 00-3358 (PJW)
CORPORATION, <i>et al.</i> ,)	
)	
Debtors,)	
<hr style="border-top: 1px dashed black;"/>		
THOMAS ABRAMS,)	
)	
Appellant,)	
v.)	Civil Action No. 04-1372 (JJF)
)	
AMC LIQUIDATING TRUST,)	
)	
Appellee.)	

**APPELLEE MOTION FOR EXTENTION OF TIME
FOR FILING NOTICE OF APPEAL**



Plaintiff-appellant *pro se* Thomas Abrams, in accordance with Federal Rule of Appellant Procedure 4(a)(5), respectfully requests an extension of time in which to file his Notice of Appeal of the Order of this Honorable Court, signed October 11, 2005 (which denied Plaintiff's Motion for Reconsideration of the Court's July 29, 2005 Order dismissing the above-captioned appeal with prejudice, for the following reasons:

- (1) The appellant was forced to evacuate his New Orleans residence due to Hurricane Katrina; and appellant has re-located for the next several months to Clearwater, Florida.

(2) Appellant has had to completely abandon his residence (half the roof blew off), along with his computer and paperwork, including the files and documents relating to the instant matter. Moreover, appellant has gone through extreme difficulty evacuating and re-locating to another state, as the result of Hurricane Katrina.

(3) Only recently has appellant obtained another computer, and his files relating to this matter have recently been rescued from his severely-damaged New Orleans residence and delivered to him.

WHEREFORE, for the foregoing reasons the plaintiff-appellant suggests good cause and excusable neglect has been shown, in accordance with Federal Rules of Appellant Procedure Rules 4(a)(5); and therefore an extension of time of 30 days is respectfully requested in which to file his Notice of Appeal.


Respectfully submitted,

A handwritten signature in black ink, appearing to read "Thomas Abrams", with a stylized flourish at the end.

Thomas Abrams, appellant *pro se*

Certificate of Service

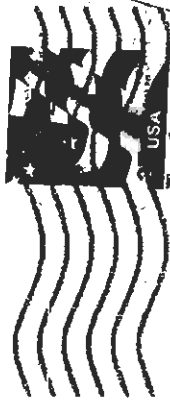
I hereby certify that a copy of the foregoing pleading has been mailed to all parties this 7th day of November, 2005.

A handwritten signature in black ink, appearing to read "Thomas Abrams", with a stylized flourish at the end.
Thomas Abrams

T. Abrams
P.O. Box 17373
Clearwater, FL 33762

ST PETERSBURG FL 337

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Honorable Clerk of Court
United States District Court
844 N. King St., LkBox 18
Wilmington, DE 19801-3570

Motion End CA# 04-1372 (JJF) 19801-3570